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7 Corrections Officer Trainee  
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8

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 \*\*\*

12 VICTOR PEREZ, as Special Administrator of  
the Estate of CARLOS PEREZ, deceased;  
13 VICTOR PEREZ, as the Guardian Ad Litem  
for S.E.P, a minor; VICTOR PEREZ, as the  
Guardian Ad Litem for A.I.P., a minor;

14 Plaintiff,

15 vs.

16 STATE OF NEVADA, ex. rel. NEVADA  
DEPARTMENT OF CORRECTIONS;  
17 DIRECTOR GREG COX, individually;  
WARDEN DWIGHT NEVEN, individually;  
18 ASSISTANT WARDER TIMOTHY FILSON,  
individually; COT RAMOS, individually;  
19 LIEUTENANT OLIVER, individually;  
CORRECTIONS OFFICER CASTRO,  
20 individually; CORRECTIONS OFFICER  
SMITH, individually; and DOES I-X,  
21 inclusive; and ROES I-X, inclusive;

22 Defendants.  
23

CASE NO. 2:15-cv-1572-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR THE  
PARTIES TO FILE THEIR  
DISPOSITIVE MOTIONS AND  
ADOPTION OF BRIEFING SCHEDULE**

**FIRST REQUEST**

24 Pursuant to IA 6-1 and LR 26-3, Plaintiff, Victor Perez, as Special Administrator of the  
25 Estate of Carlos Perez, deceased; Victor Perez, as Guardian Ad Litem for S.E.P., a minor; Victor  
26 Perez, as Guardian Ad Litem for A.I.P., a minor, Defendants State of Nevada ex. rel. Nevada  
27 Department of Corrections, Director Greg Cox, Warden Dwight Neven, Assistant Warden  
28 Timothy Filson, COT Ramos, Lieutenant Oliver, Corrections Officer Castro, and Corrections

1 Officer Smith, by and through their respective counsel of record, hereby stipulate to extend the  
 2 deadline to file Dispositive Motions in the above-captioned case by seven (7) days, up to and  
 3 including October 25, 2021. The parties further stipulate that oppositions to Dispositive Motions  
 4 will be due on November 22, 2021, and that Replies will be due on December 13, 2021.

5 This stipulation to extend time is not sought for any improper purpose or other purpose of  
 6 delay. This request for extension is based upon the following:

7 Attorney for Defendant Corrections Officer Ramos is currently preparing motions that are  
 8 due in *Latham v. Henderson*, case number A-19-790017-C; *Juma v. Clark County*, case number  
 9 2:20-cv-00120-JCM-EJY; and *Perez, et al v. Ramos, et al*, case number 2:15-cv-1572-APG-DJA.

10 Further counsel for Defendant Corrections officer Trainee Raynaldo-John Ramos will be  
 11 out of the state from October 7, 2021 to October 18, 2021.

12 The stipulated extension will not affect other deadlines of the scheduling order. Under LR  
 13 26-1(b)(5), if dispositive motions are filed, the deadline for filing the pretrial order—currently set  
 14 for November 18, 2021, ECF No. 142 at 6—will be suspended “until 30 days after decision on the  
 15 dispositive motions or further court order.”

16 WHEREFORE, the parties respectfully request that this Court extend the time for the  
 17 parties to file their Dispositive Motions by seven (7) days from the current deadline of October 18,  
 18 2021 up to and including October 25, 2021, with Oppositions due on November 22, 2021 and  
 19 Replies due on December 13, 2021.

20 DATED this 5<sup>th</sup> day of October, 2021.

DATED this 5<sup>th</sup> day of October, 2021.

21 LEWIS BRISBOIS BISGAARD & SMITH

CLARK HILL PLLC

22 /s/ Robert W. Freeman

/s/ Paola M. Armeni

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*Attorneys for the Defendants*

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*Las Vegas Metropolitan Police Department*

*Attorneys for Plaintiff*

*Officer Michael Souder*

1 DATED this 5<sup>th</sup> day of October, 2021.

2 AARON D. FORD

3 /s / Akke Levin

4 STEVEN G. SHEVORSKI

5 Nevada Bar No. 8256

6 AKKE LEVIN

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12 *Attorneys for Defendants*

*State of Nevada, ex. rel. Nevada Department*

*of Corrections, Director James Greg Cox,*

*Warden, Dwight Neven, Assistant Warden*

*Timothy Filson, and Lieutenant Ronald*

*Oliver*

DATED this 5<sup>th</sup> day of October, 2021.

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/s / Jeffrey S. Barr

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Las Vegas, Nevada 89169

*Attorneys for Defendant*

*Corrections Officer Isaiah Smith*

13 DATED this 5<sup>th</sup> day of October, 2021.

14 MARQUIS AURBACH & COFFING

15

16 /s / Craig R. Anderson

17 CRAIG R. ANDERSON

18 Nevada Bar No. 06822

JAMES A. BECKSTROM

19 Nevada Bar No. 14032

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20 *Attorneys for Defendant*

21 *Corrections Officer Castro*

22 **ORDER**

23 IT IS SO ORDERED.

24 Dated this 6<sup>th</sup> day of October, 2021.

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28 U.S. DISTRICT COURT JUDGE